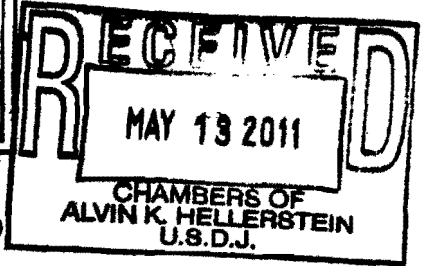


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
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DATE FILED 5/16/11



IN RE WORLD TRADE CENTER DISASTER
SITE LITIGATION

21 MC 100 (AKH)
(All Cases on Exhibit A)

IN RE COMBINED WORLD TRADE CENTER
AND LOWER MANHATTAN DISASTER SITE
LITIGATION (straddler plaintiffs)

21 MC 103 (AKH)
(All Cases on Exhibit A)

IT IS HEREBY STIPULATED AND AGREED by and between the Plaintiffs and The Port Authority of New York and New Jersey ("Port Authority") that:

1. Plaintiffs and the Port Authority have entered into a Settlement Agreement resolving claims by Plaintiffs against the Port Authority in the above-captioned action;

2. The Settling Plaintiffs, identified in Exhibit A attached hereto, have executed releases and covenants not to sue in which such Plaintiffs have released the Port Authority from any and all obligations and liability for past, present, and future injuries arising out of or relating in any way to World Trade Center-related rescue, recovery, and/or debris-removal operations and/or clean-up at any location on and/or after September 11, 2001. Accordingly, the Settling Plaintiffs' claims against the Port Authority shall be dismissed, and hereby are dismissed, with prejudice, and all cross-claims against the Port Authority shall be dismissed, with prejudice.

Dated: 5/12/11

Paul J. Napoli
Worby Groner Edelman & Napoli Bern LLP
Plaintiffs' Counsel

Dated: 5/12/11

Paul A. Scrudato
Schiff Hardin LLP
Counsel to The Port Authority of New York
and New Jersey

Dated: 5/12/11



William H. Groner
Worby Groner Edelman & Napoli Bern LLP
Plaintiffs' Counsel

SO ORDERED, this 13 day of May, 2011.



ALVIN K. HELLERSTEIN
United States District Judge